

EXHIBIT 15

**REDACTED VERSION
OF DOCUMENT
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Page 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

Case No.

UBER TECHNOLOGIES, INC.; 3 :17-cv-00939-WHA

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

/

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL ONLY

VIDEOTAPED DEPOSITION OF BLAISE GASSEND

PALO ALTO, CALIFORNIA

WEDNESDAY, AUGUST 16, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
CSR LICENSE NO. 9830
JOB NO. 2678959

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1 [REDACTED] 14:26

2 MS. CHENG: Q. [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] 14:26

6 MR. CURRAN: Objection; form. 14:26

7 THE WITNESS: [REDACTED] [REDACTED]

16 MR. CURRAN: Objection; form. 14:27

17 THE WITNESS: I don't know for a fact. 14:27

18 MS. CHENG: Q. [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] 14:27

21 MR. CURRAN: Objection; form. 14:27

22 THE WITNESS: So the -- [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] 14:27

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1 [REDACTED] [REDACTED] [REDACTED]
[REDACTED] ACT [REDACTED] 14:27

3 MS. CHENG: [REDACTED] F [REDACTED] [REDACTED]
[REDACTED] D [REDACTED] [REDACTED]
[REDACTED] A [REDACTED] [REDACTED]
[REDACTED] O [REDACTED] [REDACTED]
[REDACTED] T [REDACTED] [REDACTED]
8 A I don't think I thought about cylindrical 14:28
9 lenses at all before I joined Waymo. 14:28

10 Q [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] 14:28

12 MR. CURRAN: Objection; form. 14:28

13 THE WITNESS: Not in any kind of detail. 14:28

14 MS. CHENG: Q. What do you know about it? 14:28

15 MR. CURRAN: Objection; form. 14:28

16 THE WITNESS: Really, next to nothing. 14:28

17 MS. CHENG: Q. What do you recall? 14:28

18 MR. CURRAN: Objection; form. 14:28

19 THE WITNESS: [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] [REDACTED] [REDACTED]
[REDACTED] [REDACTED] You know, 14:29

24 I've had to do that during testing on occasion. 14:29

25 But I've never, you know, put one of these 14:29

1 CERTIFICATE OF REPORTER
2

3 I, ANDREA M. IGNACIO, hereby certify that the
4 witness in the foregoing deposition was by me duly
5 sworn to tell the truth, the whole truth, and nothing
6 but the truth in the within-entitled cause;

7 That said deposition was taken in shorthand
8 by me, a disinterested person, at the time and place
9 therein stated, and that the testimony of the said
10 witness was thereafter reduced to typewriting, by
11 computer, under my direction and supervision;

12 That before completion of the deposition,
13 review of the transcript [x] was [] was not
14 requested. If requested, any changes made by the
15 deponent (and provided to the reporter) during the
16 period allowed are appended hereto.

17 I further certify that I am not of counsel or
18 attorney for either or any of the parties to the said
19 deposition, nor in any way interested in the event of
20 this cause, and that I am not related to any of the
21 parties thereto.

22 Dated: 8/17/2017

23 

24 ANDREA M. IGNACIO,

25 RPR, CRR, CCRR, CLR, CSR No. 9830